

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MAZIN BADAWI,)	
)	
)	
Plaintiff,)	
v.)	No. 1:22-cv-706 (LMB/WEF)
)	
UR M. JADDOU, Director, United States)	
Citizenship & Immigration Services, <i>et al.</i>)	
)	
)	
Defendants.)	
)	

CONSENT MOTION FOR ENLARGEMENT OF TIME

Defendants, Ur M. Jaddou, Director, United States Citizenship & Immigration Services (“USCIS”), *et al.*, by and through undersigned counsel, hereby respectfully move – with Plaintiff’s consent – this Court for an enlargement of time in which to respond to Plaintiff’s Complaint. The grounds for this motion are set forth in further detail below.

1. Plaintiff brings the instant civil action seeking to compel USCIS to adjudicate Plaintiff’s application for naturalization. (Dkt. No. 1).
2. Plaintiff served the Complaint in this action via certified mail dated June 24, 2022; as such, pursuant to Federal Rule of Civil Procedure 12(a)(2), Defendants’ answer and/or responsive pleading is due on August 23, 2022.
3. USCIS has been working to adjudicate Plaintiff’s application. In order to allow adequate time for USCIS to complete the adjudication, Defendants seek a 30-day extension, until September 23, 2022, to respond to Plaintiff’s complaint.
4. Plaintiff consents to the relief requested herein.
5. A proposed Order is provided for the convenience of the Court.

Dated: August 23, 2022

Respectfully submitted,

JESSICA D. ABER
UNITED STATES ATTORNEY

By: /s/
ELIZABETH A. SPAVINS
Assistant United States Attorney
Office of the United States Attorney
Justin W. Williams U.S. Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3785
Fax: (703) 299-3983
Email: lizzie.spavins@usdoj.gov
Counsel for Defendants